



**CONESTOGA-ROVERS
& ASSOCIATES**

EPA Region 5 Records Ctr.



301343

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MEMORANDUM

TO: Ms. Sharon Newlon
FROM: Garth Daley/lg/107
C.C.: RRG/Clayton Site Technical Committee
P. Harvey
R. Shepherd
B. Schloessler
P. Pathak
REF. NO.: 042192-03
DATE: July 31, 2007
RE: Status Report # 21 for the Resource Recovery Group/Clayton Chemical Company Site

This Status Report is being submitted to the United States Environmental Protection Agency (U.S. EPA) and its designated On-Scene Coordinator (OSC) Kevin Turner in accordance with Section VIII, Condition 19.a. of the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the Resource Recovery Group/Clayton Chemical Soils (RRG/Clayton) Site dated October 28, 2005. The reporting period for this twenty-first Monthly Status Report is June 25, 2007, through July 20, 2007.

EFFECTIVE DATE

On November 1, 2005, Ms. Sharon Newlon, the acting counsel for the RRG/Clayton Site Potentially Responsible Party Group (The Respondents), received the AOC. In accordance with Section XXVIII, Condition 76 of the AOC, this date represented the Effective Date for the AOC and started the compliance time clock for the Removal Action. Status Report # 20 was submitted to U.S. EPA on July 2, 2007.

1.0 COMPLETED ACTIVITIES

1.1 PRE-MOBILIZATION, MOBILIZATION AND REMOVAL ACTIVITIES COMPLETED TO DATE

Activities performed during the reporting period were primarily related to the preparation of a response to the comments made by OSC Kevin Turner regarding the proposed profile of the landfill cap, which The Respondents may install at the Site, and to the continued tracking of the disposal status of the material shipped from the Site on June 5, 2007. The only field activity performed during the reporting period was a site visit by Bob Strong of The Respondents to replace the plastic sheeting on the soil stockpile created during the liquid removal activities on July 13, 2007.

The other notable activity completed during the reporting period was the completion and submission of Status Report # 20. Additional details of the completed tasks are provided for review in this report, as well as in select attachments to this report.

A weekly summary of activities appears below:

- During the week of June 25, 2007 (June 25 – June 29, 2007), the primary activities that were performed centered on the development of Status Report # 20. Reports discussing the activities completed at the Site during the week of June 4, 2007, were developed simultaneously to be included as attachments to the Status Report. On June 25, 2007, The Respondents were informed that the tanker truck containing the liquids shipped from the Site on June 5, 2007 had arrived at the CH Deer Park, TX facility on June 22, 2007. However, Clean Harbors (CH) personnel characterized the shipped liquid wastes as a mostly sludge mass at the time of material acceptance. In response to the situation, CH reportedly off loaded the estimated 300 gallons of liquids from the tanker truck, but left what they believed to be roughly 1,200 gallons of sludge in the tanker truck pending future guidance/direction. Subsequently, CRA began an investigation to determine the reason for the material transformation. This effort continued throughout the week. OSC Kevin Turner submitted an electronic mail (e-mail) message to The Respondents on June 27, 2007 with questions and comments related to the November 3, 2006 proposed profile for a landfill cover system at the Site. The Respondents subsequently began preparing a response to OSC Turner's June 27, 2007 cap profile e-mail message, with the response preparation efforts continuing throughout the remainder of the week. No Site visits were initiated during the week of June 25, 2007;
- The key activity completed during the week of July 2, 2007 involved the submission of the required project progress report (Status Report # 20). Individual reports discussing the liquid removal and Waste Drum Storage Building loading dock investigation activities completed during the week of June 4, 2007 were included as attachments to the Status Report. In addition to completing the development of the Status Report, The Respondents concurrently worked on the development of a response to the June 27, 2007 cap profile e-mail from OSC Turner and monitoring the disposal of the remaining material delivered to the CH Deer Park facility on June 22, 2007. No Site visits were initiated during the week of July 2, 2007;
- For the week of July 9, 2007, the primary focus of Site-related activities was the continued development of the response to OSC Turner's June 27, 2007 cap profile e-mail and the continued tracking of the waste disposal efforts for the remaining material from the June 5, 2007 liquid removal effort. On June 11, 2007, The Respondents were informed by Site security that the plastic sheeting that had been placed over the soil stockpile created during the liquid removal activities had come loose. Arrangements were subsequently made for Bob Strong of The Respondents to mobilize to the Site and install new protective sheeting over the soils. CRA was contacted by CH on July 12, 2007 and told that the remaining material from the tanker truck had been off loaded on July 11, 2007 and that the truck had been released following the completion of the required decontamination actions. On July 13, 2007, Mr. Strong mobilized to the Site and completed the stockpile covering activities after a Site reconnaissance was performed; and
- The continued preparation of a response to OSC Turner's landfill cover system/cap profile comments was the focus of Site related actions performed during the week of July 16, 2007. No Site visits were scheduled or completed during the week.

Additional details of the completed activities, including Site maps, are provided in the form of the Weekly Summary Reports that are included as Appendices to this report. Those reports are presented as follows: Appendix A – Weekly Summary of Site Activities for June 25 –29, 2007; Appendix B – Weekly Summary of Site Activities for July 2 – 6, 2007; Appendix C – Weekly Summary of Site Activities for July 9 - 13, 2007; and Appendix D – Weekly Summary of Site Activities for July 16 – 20, 2007.

1.2 SAMPLING AND ANALYSIS

Severn Trent Laboratories (STL) of St. Louis, Missouri replaced RTI Laboratories of Livonia, Michigan (RTI) as the laboratory of record for the Removal Action under request by the Respondents. This request was approved by OSC Turner on April 20, 2006. However, TEK-Lab, Inc. of Collinsville, Illinois (TEK-Lab) has been used for the performance of waste characterization sample analysis to assist with/complete waste disposal activities.

No samples were collected during the reporting period. However, The Respondents were informed on June 25, 2007 that CH personnel had collected a waste screening sample of the material delivered to the CH Deer Park facility on June 22, 2007.

The analytical results from the June 22, 2007 CH waste screening sample were received on June 25, 2007. A copy of the results is included as Appendix E of this report.

1.3 REMOVAL ACTION WORK

Several actions have been undertaken towards completing the Removal Action at the RRG/Clayton Chemical Site during the reporting period. An outline of the completed actions was discussed above in Section 1.1 of this report. Additional details of the activities performed are presented in the Weekly Activity Summaries included as Appendices A through D of this report.

2.0 ENCOUNTERED PROBLEMS, RESOLUTIONS, AND ANTICIPATED PROBLEMS

The only issue encountered during the reporting period related to the time delay for final disposal of the wastes shipped from the Site on June 5, 2007. As mentioned previously, a change in material composition reportedly occurred between the shipment date (liquid) and the date of delivery (reported mostly sludge mixture) to the CH Deer Park, TX facility. The anticipated method of off loading the material was then modified. Due to a scheduling conflict for the sludge pump needed to remove the sludge from the tanker truck, material off loading activities were delayed. Additionally, a scheduled maintenance plant shutdown was expected to push the material disposal date back beyond the eventual off loading date. These delays resulted in an eventual off loading date of July 11, 2007 and a projected disposal date on or after July 19, 2007. At the time of this report, confirmation had not been received regarding the final destruction of the sludge material. Accordingly, The Respondents expect to provide the eventual disposal date in Status Report # 22.

No significant technical problems were encountered during the reporting period. Similarly, no technical problems or issues are anticipated for the upcoming period.

3.0 ANALYTICAL DATA GENERATED/RECEIVED

As stated in Section 1.2, a waste screening sample was collected by personnel at the CH Deer Park, TX facility on June 22, 2007. The sample was submitted to the on site laboratory for characterization analysis, including polychlorinated biphenyls (PCBs) and British Thermal Units (BTUs). The Respondents received an electronic copy of the analytical report on June 25, 2007. A copy of the report is included as Appendix E.

4.0 ANTICIPATED ACTIVITIES FOR UPCOMING REPORT PERIOD

4.1 SITE PLANS

During the upcoming reporting period (July 23, 2007, through August 24, 2007), the following activities are anticipated:

- A response to OSC Turner's June 27, 2007 cap profile e-mail will be submitted by The Respondents;
- Removal for the remaining wood waste roll off container will/may be scheduled;
- Miscellaneous Site cleanup activities will be completed, as needed, based on the progress of the activities discussed above and weather conditions; and
- Site restoration activities, as needed, will be completed.

4.2 SAMPLING AND ANALYSIS

No sampling is anticipated during the upcoming reporting period.

4.3 REMOVAL ACTION WORK

Among the activities expected to be performed and/or completed during the upcoming report period are the removal of wood waste from the Site for disposal at the Milam Landfill facility in East St. Louis, Illinois and limited Site restoration activities. An anticipated schedule for these activities appears below.

5.0 ANTICIPATED SCHEDULE

<i>Activity</i>	<i>Duration</i>	<i>Expected Start Date</i>
Install Stormwater Control Measures	As needed/ongoing	July 23, 2007
Continue Technical Design and Construction Scheduling of Profile of the Landfill Cap	Ongoing/30 days	July 23, 2007

<i>Activity</i>	<i>Duration</i>	<i>Expected Start Date</i>
Initiate Wood Waste Removal Activities	Ongoing/30 days	July 23, 2007
Initiate Site Restoration Activities	Ongoing/30 days	July 23, 2007
Submit Status Report # 22	1 day	August 31, 2007
Attachments		

FIGURE 1

SITE MAP

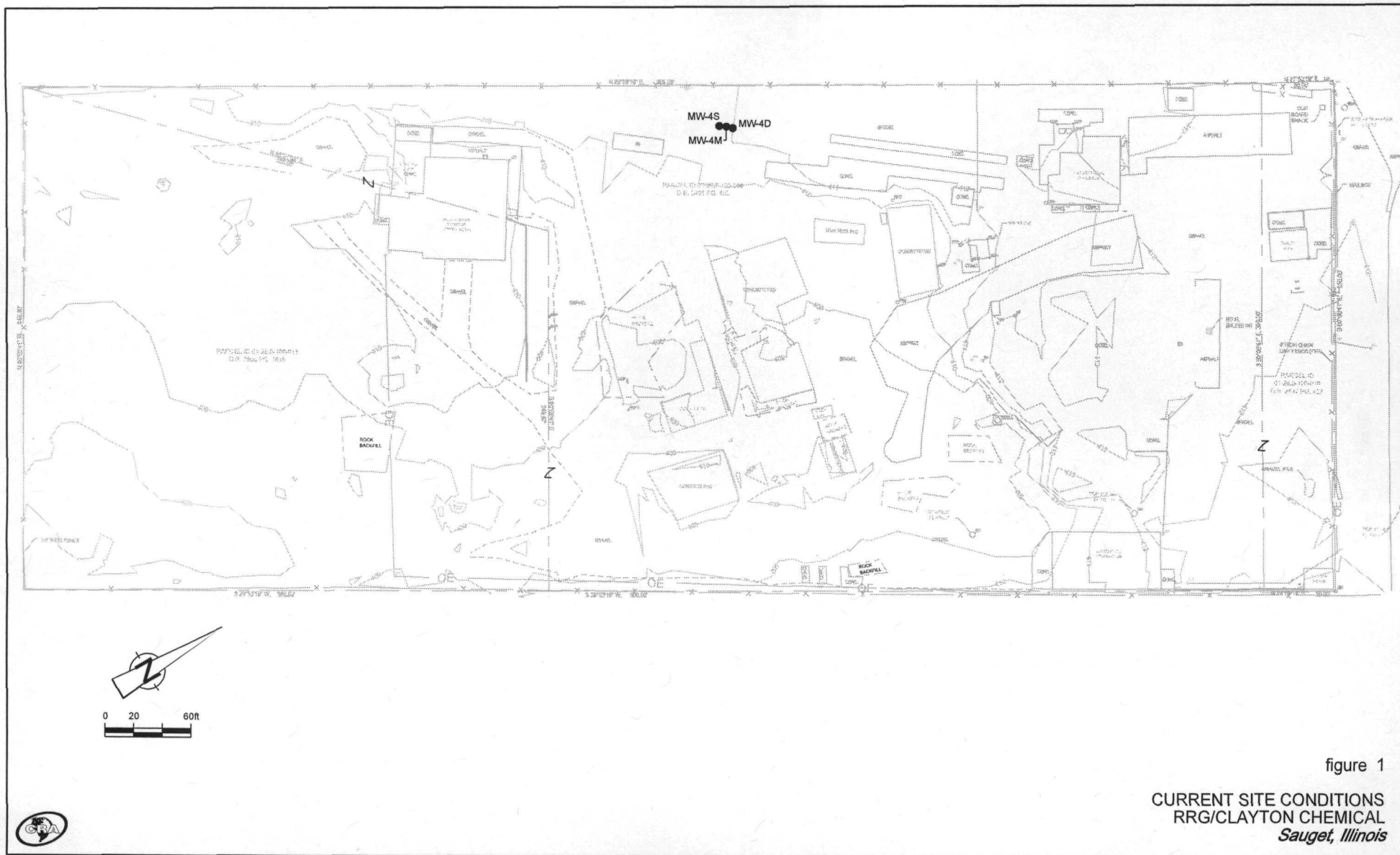


figure 1
CURRENT SITE CONDITIONS
RRG/CLAYTON CHEMICAL
Sauget, Illinois

APPENDIX A

WEEKLY SUMMARY OF SITE ACTIVITIES FOR JUNE 25 -29, 2007



**CONESTOGA-ROVERS
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MEMORANDUM

TO: RRG/Clayton Chemical Site Technical Committee REF. NO.: 042192-03

FROM: Garth Daley/Ig/103 DATE: July 31, 2007

C.C.: Sharon Newlon
P. Harvey
R. Shepherd
B. Schloessler
P. Pathak

RE: Weekly Summary Of Site Activities For June 25 - 29, 2007

Site activities began at the Resource Recovery Group/Clayton Chemical Company (RRG/Clayton) Site on Monday, December 5, 2005. These activities are in response to the Solids Removal Action as mandated by the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the RRG/Clayton Chemical Soils Site, dated October 28, 2005. A summary of the activities completed during the eighty-second week (the period June 25 through June 29, 2007) is presented below.

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
June 25, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/ Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007

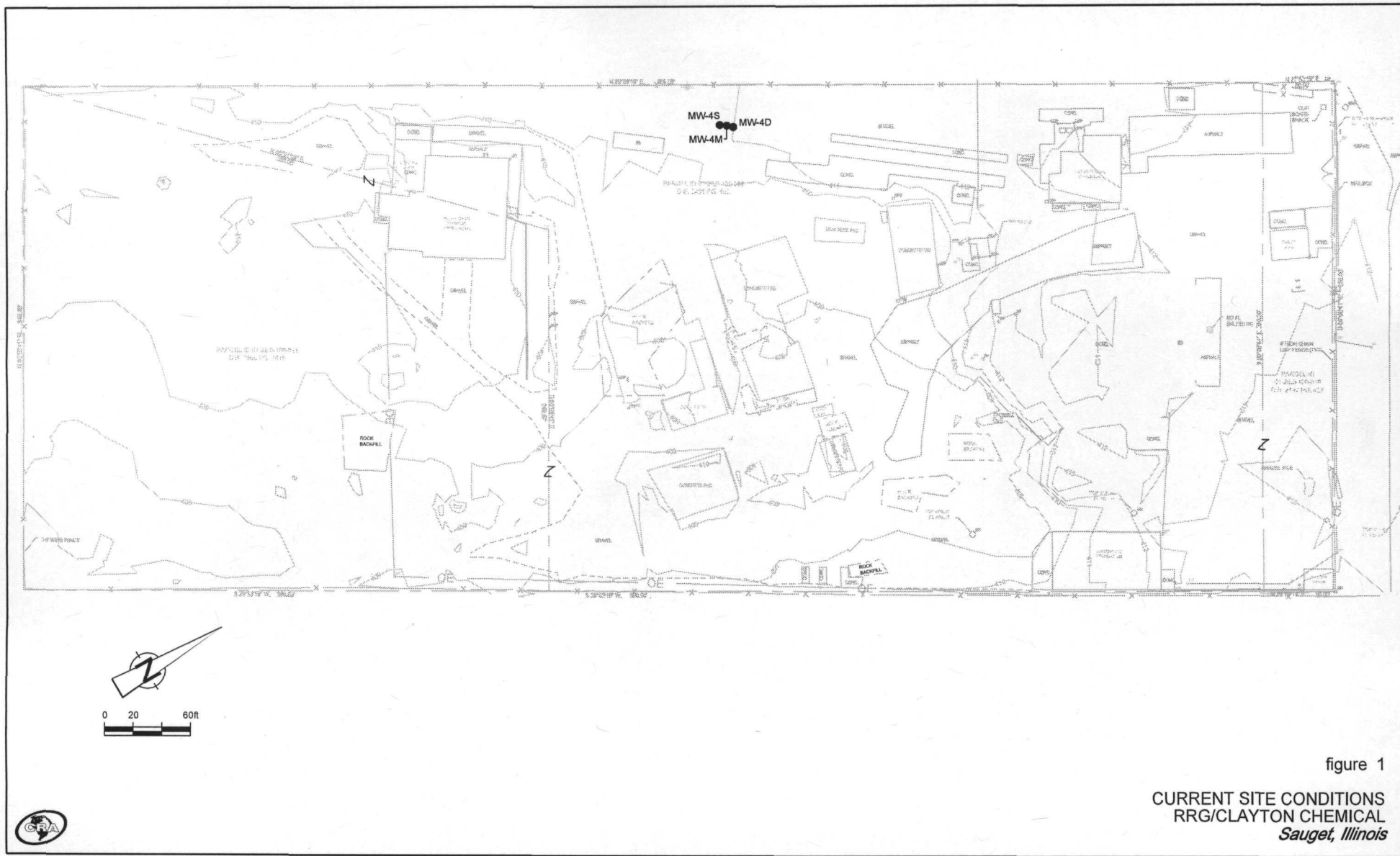
<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
June 25, 2007	Miscellaneous	The Respondents continued to investigate why the liquid wastes shipped from the Site on June 5, 2006 were reported as being a mostly sludge material upon receipt at the Clean Harbors (CH) Deer Park, TX facility. To assist in the investigation, CH provided The Respondents with the analytical screening results from June 22, 2006. CH also informed The Respondents that the liquid portion of the received load was off loaded on June 22, 2006, but that the sludge portion remained inside the tanker. The Respondents continued to prepare Status Report # 20, and the activity reports of the liquid removal and dock investigation activities that were completed during the week of June 4, 2006
June 26, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No on Site activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	The Respondents continued the liquid investigation efforts. Also, The Respondents continued to prepare Status Report # 20, and the activity reports for the activities that were completed during the week of June 4, 2006
June 27, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities. The Respondents received an e-mail from OSC Turner with comments and questions related to the cap profile submitted for U.S. EPA review on November 3, 2006 to address impacted Site soils. Subsequently, The Respondents began to prepare an appropriate response
	Site Preparation	No activity

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
June 27, 2007	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	The Respondents continued the liquid investigation efforts. The Respondents continued to prepare Status Report # 20, and the activity reports for the activities that were completed during the week of June 4, 2006. The Respondents continued to develop a response to OSC Turner's June 27, 2006 cap profile e-mail
June 28, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	The Respondents continued the liquid investigation efforts. The Respondents continued to prepare Status Report # 20, and the activity reports for the activities that were completed during the week of June 4, 2006. The Respondents continued to develop a response to OSC Turner's June 27, 2006 cap profile e-mail
June 29, 2007	Mobilization Activities	No activity

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
June 29, 2007	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	The Respondents continued the liquid investigation efforts. The Respondents continued to prepare Status Report # 20, and the activity reports for the activities that were completed during the week of June 4, 2006. The Respondents continued to develop a response to OSC Turner's June 27, 2006 cap profile e-mail

If you have any questions about the information provided in this memorandum, please contact Garth Daley (773-380-9239 or 708-203-8672), or Phil Harvey (773-380-9246) for clarification.

Attachment



APPENDIX B

WEEKLY SUMMARY OF SITE ACTIVITIES FOR JULY 2 - 6, 2007



**CONESTOGA-ROVERS
& ASSOCIATES**

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www.CRAworld.com

MEMORANDUM

TO: RRG/Clayton Chemical Site Technical Committee REF. NO.: 042192-03

FROM: Garth Daley/lg/104 DATE: July 31, 2007

C.C.: Sharon Newlon
P. Harvey
R. Shepherd
B. Schloessler
P. Pathak

RE: Weekly Summary Of Site Activities For July 2 - 6, 2007

Site activities began at the Resource Recovery Group/Clayton Chemical Company (RRG/Clayton) Site on Monday, December 5, 2005. These activities are in response to the Solids Removal Action as mandated by the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the RRG/Clayton Chemical Soils Site, dated October 28, 2005. A summary of the activities completed during the eighty-third week (the period July 2 through July 6, 2007) is presented below.

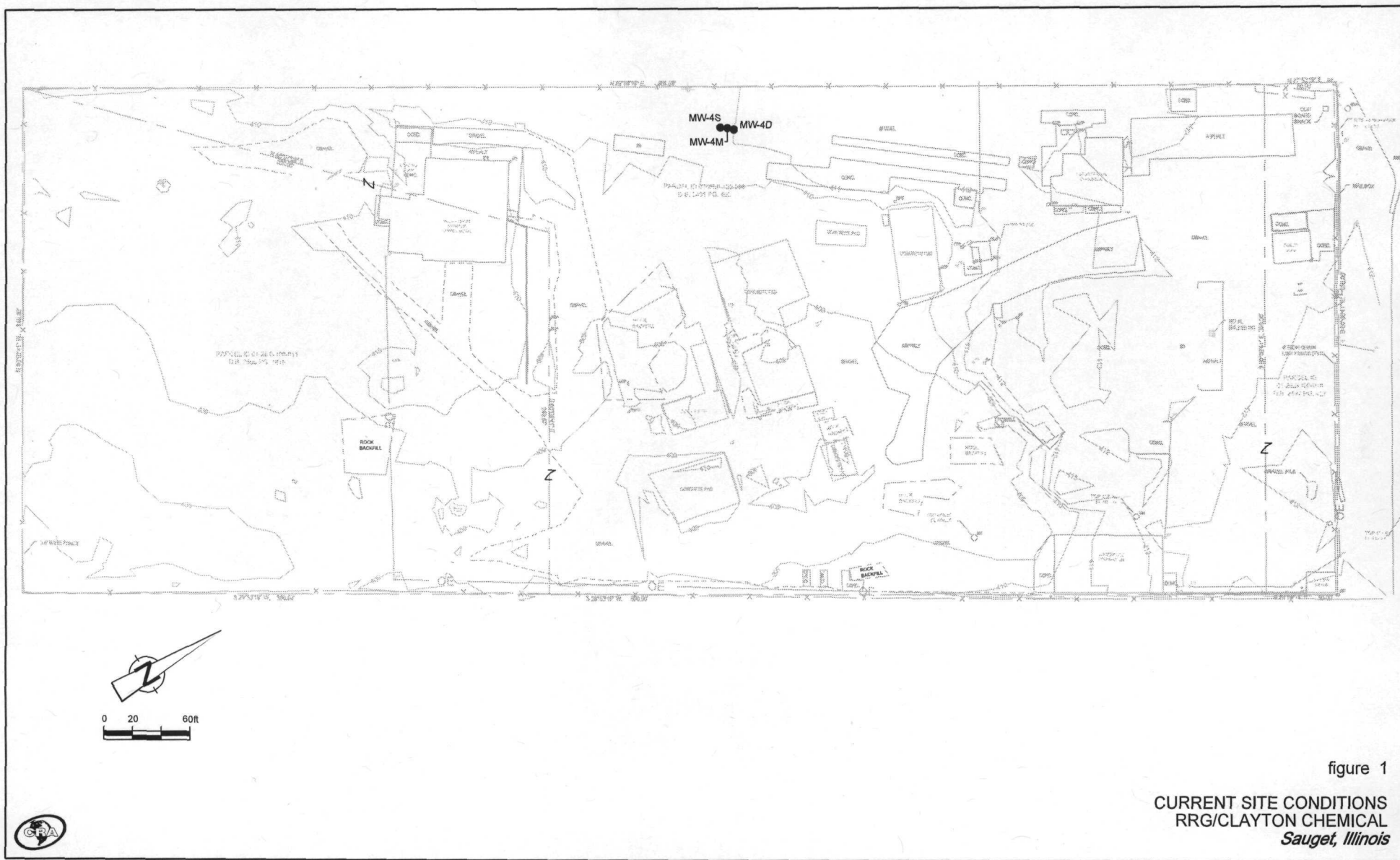
<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
July 2, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities. The Respondents submitted Status Report # 20, which includes the reports for the activities completed during the week of June 4, 2006 as attachments, to U.S. EPA
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
July 2, 2007	Miscellaneous	The Respondents continued to investigate why the liquid wastes shipped from the Site on June 5, 2006 were reported as being a mostly sludge material upon receipt at the Clean Harbors (CH) Deer Park, TX facility. Also, The Respondents continued to prepare a response to OSC Turner's June 27, 2006 cap profile e-mail
July 3, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No on Site activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	The Respondents continued the liquid investigation efforts. Also, The Respondents continued to develop a response to OSC Turner's June 27, 2006 cap profile e-mail
July 4, 2007	Mobilization Activities	No activity - holiday
	Project Coordination	No activity - holiday
	Site Preparation	No activity - holiday
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
July 4, 2007	Miscellaneous	No activity - holiday
July 5, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	The Respondents continued the liquid investigation efforts. Also, The Respondents continued to develop a response to OSC Turner's June 27, 2006 cap profile e-mail
July 6, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	The Respondents continued the liquid investigation efforts. Also, The Respondents continued to develop a response to OSC Turner's June 27, 2006 cap profile e-mail

If you have any questions about the information provided in this memorandum, please contact Garth Daley (773-380-9239 or 708-203-8672), or Phil Harvey (773-380-9246) for clarification.

Attachment



APPENDIX C

WEEKLY SUMMARY OF SITE ACTIVITIES FOR JULY 9 - 13, 2007



**CONESTOGA-ROVERS
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MEMORANDUM

TO: RRG/Clayton Chemical Site Technical Committee REF. NO.: 042192-03

FROM: Garth Daley/lg/105 DATE: July 31, 2007

C.C.: Sharon Newlon
P. Harvey
R. Shepherd
B. Schloessler
P. Pathak

RE: Weekly Summary Of Site Activities For July 9 - 13, 2007

Site activities began at the Resource Recovery Group/Clayton Chemical Company (RRG/Clayton) Site on Monday, December 5, 2005. These activities are in response to the Solids Removal Action as mandated by the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the RRG/Clayton Chemical Soils Site, dated October 28, 2005. A summary of the activities completed during the eighty-fourth week (the period July 9 through July 13, 2007) is presented below.

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
July 9, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
July 9, 2007	Miscellaneous	The Respondents continued to investigate why the liquid wastes shipped from the Site on June 5, 2006 were reported as being a mostly sludge material upon receipt at the Clean Harbors (CH) Deer Park, TX facility. Also, The Respondents continued to prepare a response to OSC Turner's June 27, 2006 cap profile e-mail
July 10, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No on Site activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	The Respondents continued the liquid investigation efforts. Also, The Respondents continued to develop a response to OSC Turner's June 27, 2006 e-mail. CH informed The Respondents that the off loading of the sludge portion of the delivered load began on July 9, 2007 and was in progress. The Respondents were also informed that due to a pending maintenance shutdown for the plant, the sludge would be placed in drums with an anticipated final disposal date on or after July 19, 2007
July 11, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
July 11, 2007	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	The Respondents continued the liquid investigation efforts. Clean Harbors informed The Respondents that off loading of the sludge had been completed and that tanker decontamination/rinse activities would be initiated as soon as possible. The Respondents were informed by Site security that the plastic sheeting for the soil stockpile had been blown off. Subsequently, attempts were made to mobilize to the Site and rectify the situation. Also, The Respondents continued to develop a response to OSC Turner's June 27, 2006 e-mail
July 12, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities. START Bob Hill was contacted and told of the situation with the soil stockpile and of the planned July 13, 2007 Site visit by The Respondents' Bob Strong
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	The Respondents were informed that CH completed the tanker rinsing activities on June 11, 2007 and released the tanker truck. Also, The Respondents continued to develop a response to OSC Turner's June 27, 2006 e-mail

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
July 13, 2007	Mobilization Activities	The Respondents Bob Strong mobilized to the Site for a reconnaissance and to replace the plastic sheeting on the soil pile from the liquid removal and investigation activities
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	The Respondents continued to develop a response to OSC Turner's June 27, 2006 e-mail

If you have any questions about the information provided in this memorandum, please contact Garth Daley (773-380-9239 or 708-203-8672), or Phil Harvey (773-380-9246) for clarification.

Attachment

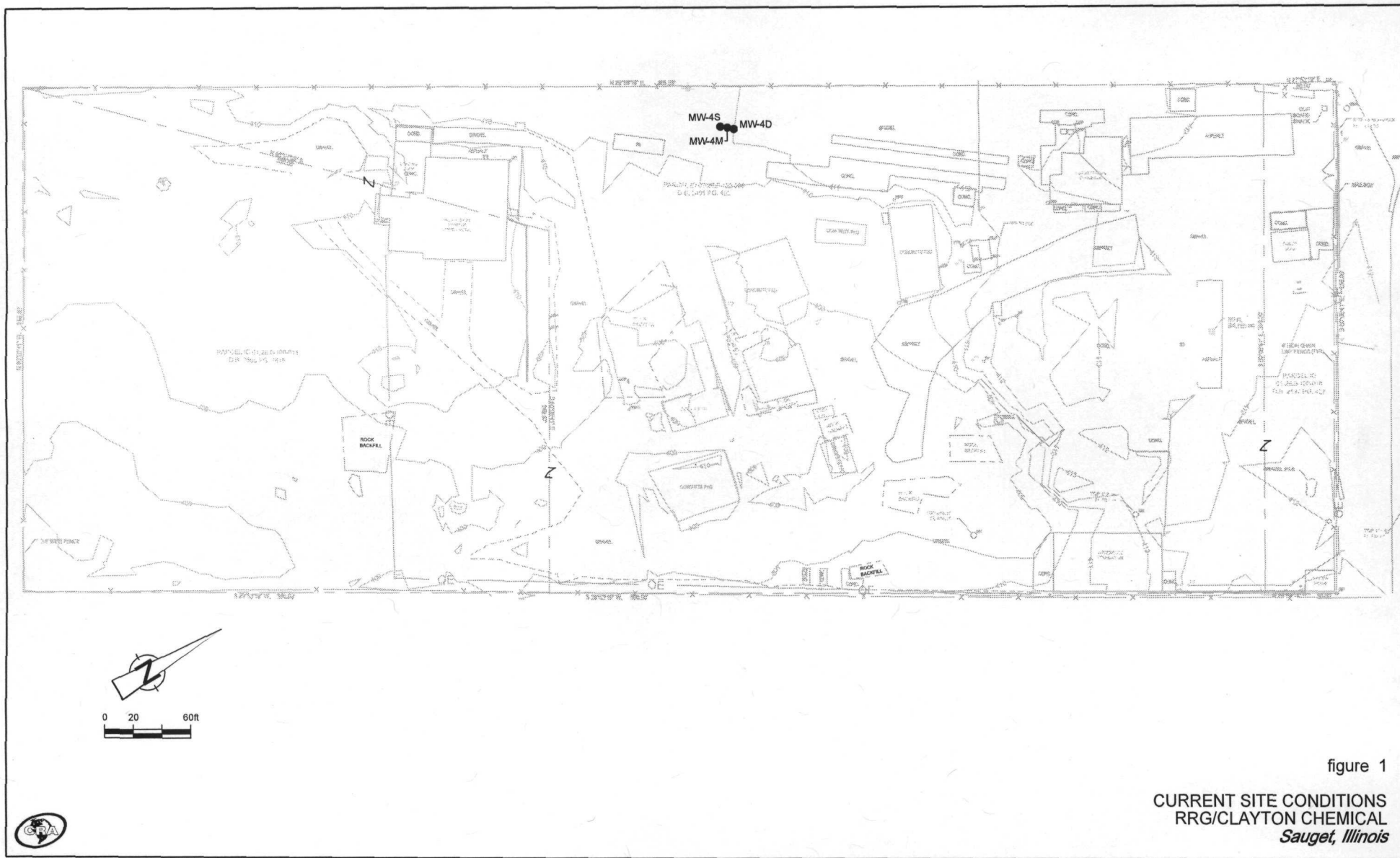


figure 1
CURRENT SITE CONDITIONS
RRG/CLAYTON CHEMICAL
Sauget, Illinois

APPENDIX D

WEEKLY SUMMARY OF SITE ACTIVITIES FOR JULY 16 - 20, 2007



**CONESTOGA-ROVERS
& ASSOCIATES**

8615 W. Bryn Mawr Avenue, Chicago, Illinois 60631
Telephone: (773) 380-9933 Fax: (773) 380-6421
www.CRAworld.com

MEMORANDUM

TO: RRG/Clayton Chemical Site Technical Committee REF. NO.: 042192-03

FROM: Garth Daley/lg/106 DATE: July 31, 2007

C.C.: Sharon Newlon
P. Harvey
R. Shepherd
B. Schloessler
P. Pathak

RE: Weekly Summary Of Site Activities For July 16 - 20, 2007

Site activities began at the Resource Recovery Group/Clayton Chemical Company (RRG/Clayton) Site on Monday, December 5, 2005. These activities are in response to the Solids Removal Action as mandated by the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the RRG/Clayton Chemical Soils Site, dated October 28, 2005. A summary of the activities completed during the eighty-fifth week (the period July 16 through July 20, 2007) is presented below.

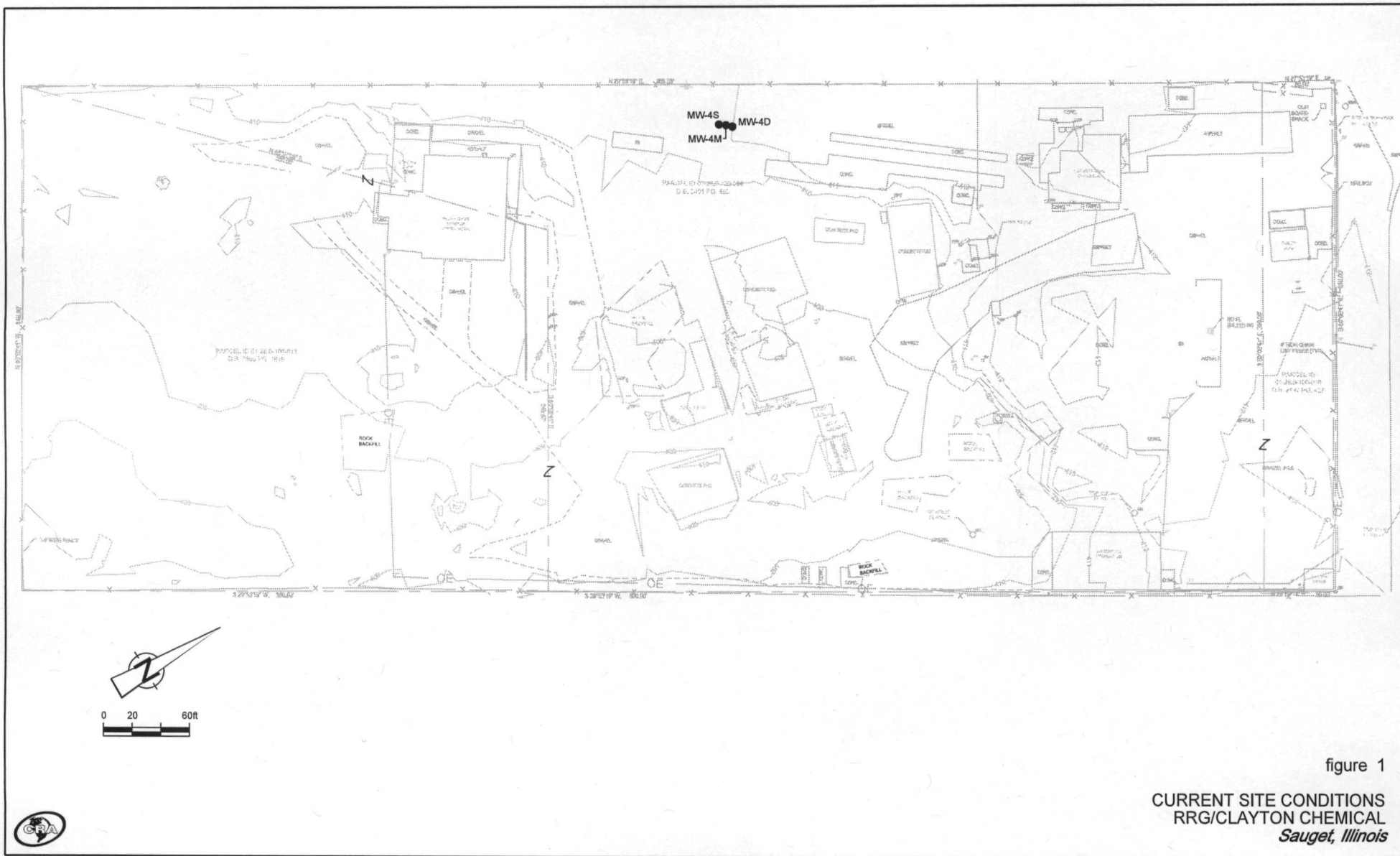
<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
July 16, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities. START Bob Hill was contacted via telephone and given a Site status update
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	The Respondents continued to prepare a response to OSC Turner's June 27, 2006 cap profile e-mail

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
July 17, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No on Site activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	The Respondents continued to develop a response to OSC Turner's June 27, 2006 cap profile e-mail
July 18, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	The Respondents continued to develop a response to OSC Turner's June 27, 2006 cap profile e-mail
July 19, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
July 19, 2007	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	The Respondents continued to develop a response to OSC Turner's June 27, 2006 cap profile e-mail
July 20, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	The Respondents continued to develop a response to OSC Turner's June 27, 2006 cap profile e-mail

If you have any questions about the information provided in this memorandum, please contact Garth Daley (773-380-9239 or 708-203-8672), or Phil Harvey (773-380-9246) for clarification.

Attachment



APPENDIX E

ANALYTICAL REPORT FOR JUNE 22, 2007 CLEAN HARBORS' WASTE SCREENING
SAMPLE

Waste Sampling and Analysis

Receiving Lab

Sample Type	Incoming	LOT Number	3916242		
Company	CLAYTON	Blend Tank		Blend #	
Profile	CH254343B	Prod		Lab No	
Load #	295212	Trailer #	105		

I Sampling

Sampled By		Sample Date		Comments	
Description	RL4979				

II Field Testing

Tested By		Radioactivity (uR/hr)	RL2000	Background	5
Waste	5	LEL %		Method-Gastech (Manufacturer)	

III Lab Analysis

Analyst	AE	Date	06/22/2007
Description of Sample	MIX OF LUMPY SOLID AND WATERY LIQUID	PCBs (ppm)	13
	RL4979	EL8080 L/S	
Compatibility Test	Not Performed	OK TO T-71(SLUDGE MAY POSE SUCTION AND PUMPING PROBLEMS)..J.COPE IS AWARE	
	RL5058		
Comments	H2ORX=NEG FP SCREENING		

Layer	BTU lb/lb RL5050P	Ash (wt %) RL160_3A	Scrub (lbs/lb) RL305_2	Chloride (wt. %) RL2361	Specific Gravity RL1298	Bulk Density (lbs/ft3) RL5057	lbs/gal	Viscosity (cps) RL4212/RL2196	Paint Filter RL9095	Flash Point RL1010/RL4892	pH RL9045	Solids (wt. %) RL160_3S	Fluoride (ppm) RL3402
1	2403	1.0	0.00	0.7	0.98		8.2	1150	Not Performed	141	7.0	1	150

Metals (PPM) *

Sb	As	Ba	Be	Cd	Cr	Cu	Fe	Pb	Hg	Ni	K	Se	Ag	Na	S	TL	V	Zn
15	7	5	0.4	1	5	6	442	6	0.01	5	37	11	1	73	352	7	4	5
<	<	<	<	<	<			<	<	<	<	<				<	<	<

* All metals via Method 6010 except Hg, which is via Method 7471

Analyst: JK

Performed: 6/22/2007 2:11:05 PM

Reviewed By: _____ Date: ____/____/____

Reviewed By: _____ Date: ____/____/____

Monday, June 25, 2007

Disclaimer/Notification: This analytical data is intended for Clean Harbors Deer Park, LP internal use for waste disposal/processing only and is not intended for use by customers for waste characterization purposes

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